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8 Attorneys for Plaintiff
9 UNITED STATES OF AMERICA

10 UNITED STATES DISTRICT COURT

11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 AHMED HOSSAM ELDIN ELBADAWY, et
al.,

16 Defendants.
17
18

No. 2:24-CR-595-JWH-1

STIPULATION FOR ORDER AUTHORIZING
THE INTERLOCUTORY SALE OF
CRYPTOCURRENCY

19 It is hereby stipulated by and between the United States of
20 America ("the government") and Ahmed Hossam Eldin Elbadawy
21 ("defendant"), by and through his counsel of record, Christopher
22 Downey, Esq., with regard to the following assets (collectively, the
23 "Seized Cryptocurrency"):

24 a) 174.93507503 Bitcoin seized from defendant on March 1,
25 2023 and currently held in a Bitcoin address ending HrjVKp; and

26 b) 1,306.745425583278022653 Ethereum seized from
27 defendant on March 1, 2023 and held in a Ethereum address ending
28 c4b49f.

1 1. The parties hereto desire to sell/exchange for U.S.
2 currency, the above-listed cryptocurrency (the Seized Cryptocurrency)
3 for fair market value, and agree that the net proceeds of the sale,
4 if any, be substituted in as the substitute res in this action.
5 Pursuant to Rule G(7)(b)(iii) of the Supplemental Rules for Admiralty
6 or Maritime Claims and Asset Forfeiture Claims, the parties agree
7 that the procedures set forth in 28 U.S.C. §§ 2001, 2002 and 2004
8 (providing for public sale of property under court control) are not
9 likely to yield the highest price for the property, and instead
10 recommend that the court enter the proposed order (the "Order")
11 concurrently lodged with this stipulation ordering interlocutory sale
12 according to the terms described herein.

13 2. Cryptocurrency exchange reports from approximately May 2024
14 through April 2025, attached herein as Exhibit A, show the current
15 exchange rate for Bitcoin and Ethereum to U.S. currency using
16 coinmarketcap.com as the primary index to determine market value of
17 any digital currency. Each of these cryptocurrency's values have
18 shown large fluctuations during that time frame.

19 3. The government and defendant agree that the government, to
20 include United States Marshals Service, shall be authorized to take
21 exclusive custody, possession, and control of the above-listed
22 cryptocurrency for the purpose of marketing the property for sale.

23 4. After taking custody, possession, and control of the Seized
24 Cryptocurrency, the government shall cause the Seized Cryptocurrency
25 to be sold/exchanged at the highest available reasonable price.

26 5. Defendant agrees to complete all forms necessary to permit
27 the government to complete the sale of the Seized Cryptocurrency.

1 Such completed forms may include granting to an appropriate
2 government agent a limited power of attorney for such purpose.

3 6. The parties agree that the net proceeds from the
4 sale/exchange of the Seized Cryptocurrency shall constitute the
5 substitute res in place of the Seized Cryptocurrency. The net
6 proceeds shall be deposited directly to an interest-bearing account
7 to be designated by the government, where such funds shall be held
8 pending resolution of this civil forfeiture case. Upon delivery of
9 the net proceeds to the interest-bearing account, the government
10 shall notify the parties and this Court of the amount that has been
11 deposited as the substitute res by filing a notice with the Court.

12 7. The parties to this Stipulation shall execute any and all
13 documents necessary to consummate the sale of the Seized
14 Cryptocurrency.

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1 8. The Court shall retain jurisdiction over the Seized
2 Cryptocurrency to effectuate the terms of the sale and resolve any
3 issues or disputes that may arise regarding the interlocutory sale of
4 the property.

5 SO STIPULATED AND REQUESTED.

6 DATED: September 16, 2025

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Acting United States Attorney

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8 DAVID T. RYAN
Assistant United States Attorney
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9 JONATHAN GALATZAN
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13 _____
LAUREN RESTREPO
Assistant United States Attorney

14 Attorneys for Plaintiff
15 United States of America

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17 DATED: Sept. 16, 2025

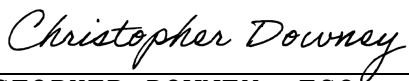

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19 ROBERT PACE, ESQ.
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Attorneys for Defendant Ahmed Hossam
20 Eldin Elbadawy
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EXHIBIT A



